

**RE: ENHANCED DISCLOSURE AND NEW PROSPECTUS DELIVERY OPTION
FOR REGISTERED OPEN-END MANAGEMENT INVESTMENT COMPANIES**

SEC,

I am a Financial Advisor and would like to thank you for your consideration of this proposed change. I am in favor of the proposal and feel that it would well serve the public. Please consider that many advisors may not even offer a particular mutual fund investment currently just because they are currently out of prospectus supplies or may have supplies that are out of date. I believe that this will reduce the burden on advisors to constantly have to check dates and keep inventories up-to-date on prospectuses. This should also reduce costs to fund companies because of the substantial costs associated with printing, shipping and staffing for the same.

Also, after review of the FSI additional recommendations (see attached FSI pdf), I would favor those being implemented into the regulation. We would not want the SEC to “favor” any distribution channel (I am independent) by focusing just on fees and/or placing fees at the top of the document! Indeed, the fees are already buried in the current prospectuses, which we have to open and show clients and that varies by prospectus. Please consider the FSI suggestions since they represent many advisors.

Thanks again for considering this change. I believe it is long overdue and also that it will aid investors in more clearly understanding all the important information about an investment before they decide.

Sincerely,

**Andrew C. Bambeck III/Branch Manager
Raymond James Financial Services, Inc.
Eaton, OHIO**

FSI Recommendations:

VIA ELECTRONIC MAIL

February 28, 2008

Nancy M. Morris
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

RE: File Number S7-28-07 - Enhanced Disclosure and New Prospectus Delivery Option for
Registered Open-End Management Investment Companies

Dear Ms. Morris:

On November 1, 2007, the Securities and Exchange Commission (SEC) proposed a revised mutual fund disclosure framework that is designed to provide investors with a concise and easy to read summary of information relevant to their investment decision (Proposal).¹ Under the Proposal, a summary of key information would appear in plain English at the front of the statutory prospectus. The Proposal would also allow mutual fund sponsors to provide investors this key information via a summary prospectus (Summary Prospectus), while making the more detailed information contained in the full prospectus available on the Internet or by e-mail or hard copy as requested by the investor.

The Financial Services Institute² (FSI) commends the SEC for this groundbreaking Proposal. FSI has long believed that the complexity and quantity of investment disclosure has become intimidating to most investors. As a result, we have advocated for more effective disclosure through the use of concise user-friendly documents. We believe the SEC's Proposal largely achieves the goal of enhancing mutual fund disclosure by simplifying it. The SEC deserves considerable praise for these efforts. However, FSI offers a number of recommendations we believe will further improve the quality of disclosure to investors provided by the Summary Prospectus. These specific comments are offered below.

Background on FSI Members

The independent broker-dealer (IBD) community has been an important and active part of the lives of American investors for more than 30 years. The IBD business model focuses on comprehensive financial planning services and unbiased investment advice with little, if any, proprietary product bias.³ IBD members also share a number of other similar business characteristics. They generally clear their securities business on a fully disclosed basis; primarily engage in the sale of packaged products, such as mutual funds and variable insurance products;

¹ See the proposing release at <http://sec.gov/rules/proposed/2007/33-8861.pdf>.

² The Financial Services Institute was formed on January 1, 2004. Our members are broker-dealers, often dually registered as federal investment advisers, and their independent contractor registered representatives. FSI has 114 Broker-Dealer member firms that have more than 135,000 affiliated registered representatives serving more than 14 million American households. FSI also has more than 12,600 Financial Advisor members.

³ Some large independent broker-dealer firms offer proprietary products such as mutual fund, variable annuity, and/or investment adviser products produced by an affiliated or parent insurance company, broker-dealer, or investment adviser. Nevertheless, these IBD firms, and their proprietary products, represent the exception to the rule.

take a comprehensive approach to their clients' financial goals and objectives; and provide investment advisory services through either affiliated registered investment adviser firms or such firms owned by their registered representatives. Due to their unique business model, IBDs and their affiliated financial advisors are especially well positioned to provide middle-class Americans with the financial advice, products, and services necessary to achieve their financial goals.

In the U.S., approximately 110,000 independent financial advisors – or almost 20 percent of all registered representatives – practice in the IBD channel.⁴ These financial advisors are independent contractors, rather than employees of the IBD firms. Independent financial advisors provide comprehensive and affordable financial services that help millions of individuals, families, small businesses, associations, organizations, and retirement plans with financial education, planning, implementation, and investment monitoring. Clients of independent financial advisors are typically “Main Street America” – it is, in fact, almost part of the “charter” of the independent channel. The core market for advisors affiliated with IBDs is clients with a net worth of \$250,000. Independent financial advisors are entrepreneurial business owners who typically have strong ties, visibility, and individual name recognition within their communities and client base. Independent financial advisors get to know their clients personally and provide them investment advice in face-to-face meetings. Most of their new clients come through referrals from existing clients or other centers of influence.⁵ Due to their close ties to the communities in which they operate their small businesses, we believe these financial advisors have a strong incentive to make the achievement of their clients' investment objectives their primary goal.

The Proposal is of particular interest to FSI members. The Proposal would require every prospectus to include a summary section at the front of the document that consists of certain key information about the specific mutual fund. This information would be required to appear in a standardized order and in plain English. The proposal would also change the prospectus delivery requirement for mutual funds by allowing financial advisors to fulfill their obligations by providing investors with a Summary Prospectus. The Proposal will greatly improve mutual fund disclosure by providing investors with a concise summary of important facts about a mutual fund in a quick and convenient way. We believe the Proposal represents a significant improvement over the current mutual fund disclosure system. However, we offer the following recommendations intended to better serve the goal of providing investors with the information needed to make informed investment decisions.

Comments

FSI believes the quality of disclosure provided by the Summary Prospectus would be improved substantially by making the following changes to the Proposal:

1. Promote Readability by Reordering the Presentation of Information – The Proposal specifies both the content of the Summary Prospectus and the order of presentation of the required information. FSI supports the standardized order of presentation of data in the Summary Prospectus because we believe it will facilitate investor understanding and efforts to compare mutual funds. However, we are troubled about the specific order of presentation outlined in the Proposal because we believe it detracts from the logical flow of the Summary Prospectus in an attempt to emphasize the importance of fees and expenses associated with the fund.⁶ FSI is concerned that placing the fee table second in

⁴ Cerulli Associates, Quantitative Update: Intermediary Markets 2006. Please note that this figure represents a conservative estimate of independent financial advisors. In fact, more than 130,000 financial advisors are affiliated with FSI member firms.

⁵ These “centers of influence” may include lawyers, accountants, human resources managers, or other trusted advisors.

⁶ See page 21 of the Proposal.

